# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)
Plaintiff,	)
VS.	) Cr. No. 20-1566 DHU
STACEY YELLOWHORSE,	)
Defendant.	)

# **UNITED STATES' WITNESS LIST**

The United States of America respectfully submits the following list of anticipated witnesses for trial in this matter. The United States does not waive the right to supplement this list.

- 1. Vera Damon
  - Victim's mother, saw the victim on the day of her disappearance and spoke with Defendant Yellowhorse on the day of and after the victim's disappearance. The United States estimates direct examination will require 1 hour.
- 2. Tanya Vanwinkle

Victim's girlfriend. Saw the victim leave in a vehicle with Defendants Yellowhorse and Chischilly on the day of the victim's disappearance. The United States estimates direct examination will require ½ hour.

- 3. Shauna Martinez
  - Defendant Yellowhorse's Sister. 404(b) witness. <u>See</u> Doc. 102. Observed Yellowhorse and Chischilly together.
    The United States estimates direct examination will require ½ hour.
- Special Agent Sean MacManus (FBI)
   Cellular location expert
   USA anticipates direct examination will require 1 hour

## 5. Phoebe Yazzie

404(b) witness. <u>See</u> Doc. 102. Observed Yellowhorse and Chischilly together. The United States estimates direct examination will require ½ hour.

# 6. Jennifer Chischilly

Present for statements Timothy Chischilly made against interest about the offense. The United States anticipates testimony will require 1 hour.

# 7. Timothy Chischilly

The United States anticipates that Mr. Chischilly will invoke his Fifth Amendment privilege not to testify. See Doc. 121. In the event he does not, the United States estimates that direct examination will take 2 hours.

## 8. Anson Damon

Victim's brother. Will testify that he saw and heard from victim on the day of her disappearance.

The United States anticipates direct examination will require ½ hour.

## 9. Andrew Anderson

Will testify to Timothy Chischilly's statements against interest about the offense. Will testify to what he saw in Chischilly's vehicle.

The United States anticipates direct examination will require 1 hour.

## 10. Matisha Anderson

Will testify to Timothy Chischilly's statements against interest about the offense and Defendant Yellowhorse's statements related to the offense.

The United States anticipates direct examination will take 1 hour.

#### 11. Alexandra Chee

Will testify to Timothy Chischilly' statements against interest about the offense. The United States anticipates direct examination will take 1/2 hour.

#### 12. Patricia Yellowhorse

Defendant Stacey Yellowhorse's step-mother. Present for statements Defendant Yellowhorse made about the offense.

The United States anticipates direct examination will require 1/2 hour

#### 13. Herman Yellowhorse

Defendant Stacey Yellowhorse's father. Present for statements Defendant Yellowhorse made about the offense and for statements Timothy Chischilly made against interest about the offense. The United States anticipates direct examination will require 1/2 hour.

## 14. Marvin Garcia (FBI personnel)

Present for search of Defendant Chischilly's home, burn pit near the home, and Chischilly vehicle. Collected physical evidence.

The United States estimates direct examination will require 1 hour.

## 15. Special Agent Alicia Harris

Present for search of Defendant Chischilly's home and burn pit near the home. The United States estimates direct examination will require ½ hour

## 16. Special Agent Nancy Stemo

Present for search of Defendant Chischilly's home and burn pit near the home. The United States estimates direct examination will require ½ hour

# 17. Tammy Peter (FBI personnel)

Present for and took photos of search of Defendant Chischilly's home and 2 vehicles.

The United States anticipates direct examination will require 1 hour

# 18. Raeanne Peterson (FBI personnel)

Present for and took photos of search of burn pit near Defendant Chischilly's home. Present for and collected evidence during search of Defendant Chischilly's home.

The United States anticipates direct examination will require ½ hour

# 19. Ross Wilson (FBI personnel)

Present for search of Defendant Chischilly's home and dumpsite near the home. The United States estimates direct examination will require ½ hour

# 20. Margaret Thomas (FBI personnel)

Present for search of Defendant Chischilly's home, dumpsite near the home, and Chischilly vehicle. Collected physical evidence.

The United States estimates direct examination will require 1 hour.

## 21. Special Agent Bradley Koons

Present for search of Defendant Chischilly's white Buick The United States anticipates direct examination will require ½ hour

# 22. Special Agent Matthew Roe

Present for discovery of victim's skull with Defendant Yellowhorse. The United States estimates direct examination will require ½ hour

#### 23. Donavan Bicenti Navajo PD

Present for discovery of victim's skull with defendant Yellowhorse and took photographs of it.

The United States estimates direct examination will require ½ hour.

# 24. Custer Bryant

Navajo Criminal Investigator. Present for searches of Defendant Chischilly's home and interviews with Defendants Yellowhorse and Chischilly.

The United States estimates direct examination will require 1 hour.

# 25. Special Agent David Loos

Case Agent

The United States anticipates direct examination will require 4 hours.

#### 26. Special Agent Mark Stephenson

Will testify to contents of Facebook search.

The United States anticipates direct examination will require ½ hour.

# 27. Robert W. Allen (Oklahoma State University)

Forensic Lab director who forensically identified victim's remains The United States estimates direct examination will require 1 hour.

#### 28. Ross Zumwalt UNM

OMI doctor.

The United States anticipates direct examination will take 1 hour

## 29. Nicole Jackson

OMI doctor.

The United States anticipates direct examination will take 1 hour

# 30. Heather Edgar UNM

Forensic Anthropologist

The United States anticipates direct examination will take 1 hour

#### 31. Anna Rautman UNM

Forensic Anthropologist

The United States anticipates direct examination will take 1 hour

## 32. Shannon Prince (FBI)

Forensic fingerprint analyst

Rebuttal witness

#### 33. Jason Talley

Witness who travelled with Defendants Yellowhorse and Chischilly to dump ash after the victim disappeared.

The United States estimates direct examination will take 1 hour.

## 34. Alan Guisti

Forensic DNA analyst

The United States anticipates direct examination will take 1 hour

Respectfully submitted,

ALEXANDER M.M. UBALLEZ United States Attorney

Electronically filed on June 1, 2022

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I HEREBY CERTIFY that I filed the foregoing pleading electronically through the CM/ECF system which caused the following parties or counsel to be served by electronic means, as reflected on the Notice of Electronic Filing, and other methods of service as indicated therein.

/s/
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